

Sasha G. Rao (CSB # 244303)
sasha.rao@ropesgray.com
Brandon H. Stroy (CSB # 289090; *pro hac vice*)
brandon.stroy@ropesgray.com
Carolyn L. Redding (CSB # 280666)
carolyn.redding@ropesgray.com
Matthew E. Prosen (CSB # 280531)
matthew.prosen@ropesgray.com
Christopher M. Bonny (CSB # 280554)
christopher.bonny@ropesgray.com
ROPS & GRAY LLP
1900 University Avenue, 6th Floor
East Palo Alto, California 94303-2284
Telephone: (650) 617-4000
Facsimile: (650) 617-4090

Attorneys for Plaintiff
JESSE WASHINGTON

KAMALA D. HARRIS
Attorney General of California
WILLIAM C. KWONG
Supervising Deputy Attorney General
D. Robert Duncan
Deputy Attorney General
State Bar No. 161918
Scott J. Feudale
Deputy Attorney General
State Bar No. 242671
455 Golden State Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 703-5739
Fax: (415) 703-5843
E-mail: Robert.Duncan@doj.ca.gov
E-mail: Scott.Feudale@doj.ca.gov

Attorneys for Defendant
D. SANDOVAL

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

1 JESSE WASHINGTON,

2 Plaintiff,

3 v.

4 D. SANDOVAL,

5 Defendant.

6) Case No. 10-CV-250-LHK (PSG)

7) **JOINT STIPULATION AND**
8) **[PROPOSED] ORDER TO EXTEND**
9) **EXPERT DISCOVERY DEADLINES**

10)

11)

12)

13)

14)

15)

16)

17)

18)

19)

20)

21)

22)

23)

24)

25)

26)

27)

28)

Plaintiff Jesse Washington and Defendant D. Sandoval (collectively, the “Parties”), by and through their respective counsel, hereby agree and stipulate as follows:

1. The Court’s Case Management Order filed on November 14, 2012 set the deadlines for expert disclosures on April 29, 2013, supplemental expert disclosures on May 13, 2013, and expert discovery on May 27, 2013.

2. No previous time modifications have been made in the case, whether by stipulation or Court order.

3. The Parties agree that additional time is needed to prepare expert disclosures and to conduct expert discovery.

4. The parties hereby respectfully stipulate that the deadlines for expert disclosures, supplemental expert disclosures, and expert discovery shall be changed as follows:

Event	Current Date	Proposed Date
Expert Disclosures	April 29, 2013	May 13, 2013
Supplemental Expert Disclosures	May 13, 2013	May 27, 2013
Expert Discovery Cutoff	May 27, 2013	June 10, 2013

1 5. The proposed time modifications do not affect any other dates in the case
2 schedule, including the pretrial conference and trial.

3
4
5
6 April 23, 2013

Respectfully submitted,

By /s/ Sasha G. Rao
Sasha G. Rao
Sasha.Rao@ropesgray.com

Brandon H. Stroy
Carolyn L. Redding
Matthew E. Prosen
Christopher M. Bonny
ROPES & GRAY LLP

Attorneys for Plaintiff
JESSE WASHINGTON

13
14 April 23, 2013

By
/s/ D. Robert Duncan
D. Robert Duncan
Robert.Duncan@doj.ca.gov

Kamala D. Harris
William C. Kwong
Scott J. Feudale
STATE OF CALIFORNIA
DEPARTMENT OF JUSTICE

Attorneys for Defendant
D. SANDOVAL

21
22
23 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5.1(i)(3)**

24 I, Christopher M. Bonny, attest that concurrence in the filing of this document has been obtained
from the other signatory. I declare under penalty of perjury under the laws of the United States
of America that the foregoing is true and correct.

25
26 Executed on April 23, 2013

/s/ Christopher M. Bonny
Christopher M. Bonny

1

2 PURSUANT TO STIPULATION, IT IS SO ORDERED.

3

4 Date: April 26, 2013

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

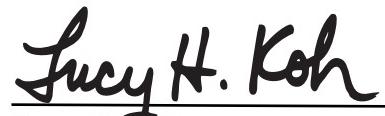
24

25

26

27

28



Lucy H. Koh
United States District Judge